

REMARKS

Applicant respectfully requests reconsideration and allowance of the subject application in view of the foregoing amendments and the following remarks.

Claims 1-3, 5-7, 9-10, and 12-30 are pending in the application, with claims 1, 16, and 23 being independent. Applicant cancels claim 4 without prejudice, waiver, or disclaimer of the subject matter. Applicant amends claims 1, 16, and 23 to further clarify features of the claimed subject matter. The original specification and drawings support these claim amendments at least at page 7, lines 3-21. Therefore, claims 1-3, 5-7, 9-10, and 12-30 are presented and directed to subject matter of the original disclosure.

OBJECTION TO THE SPECIFICATION

The specification is objected to as failing to provide proper antecedent basis for the claimed subject matter. Applicant respectfully disagrees. Applicant would like to direct the Office to page 19, lines 8-19. Therefore, Applicant respectfully requests that the objection to the specification be withdrawn.

CLAIM REJECTIONS UNDER 35 U.S.C § 102

Claims 16, 18, and 22 stand rejected under 35 U.S.C. § 102(a) as being anticipated by U.S. Patent No. 6,486,898 to Martino et al (Martino). This rejection is respectfully traversed for at least the reasons outlined below.

Without conceding the propriety of the stated rejection, and only to advance the prosecution of this application, Applicant amends independent claim 16 to further clarify

features of the claimed subject matter. Amended claim 16 now recites a method comprising (emphasis added):

- displaying a first end point;
- displaying components associated with the first end point;
- displaying a second end point;
- displaying components associated with the second end point;
- displaying a common component associated with the first end point and the second end point;
- displaying a link between the common component and the first end point;
- displaying a link between the common component and the second end point;
- determining a path strength associated with the common component by, at least in part,:
 - determining a first link strength for the link between the common component and the first end point;
 - determining a second link strength for the link between the common component and the second end point;
- and
- calculating the path strength *between the first endpoint and the second endpoint* based at least in part on multiplying the first link strength and the second link strength.

Applicant respectfully submits that the Office has failed to show that Martino discloses such a method.

The Reference Fails to Show the Claimed Method

The Office has failed to show that Martino discloses a method for calculating a path strength between a first endpoint and a second endpoint. Rather, Martino describes information related to a reference node is displayed prominently, and information items related to the other nodes are displayed with a prominence that reflects each node's degree of separation from the user selected reference node. *See*, Abstract. To present a

consistent interface regardless of the user's point of reference, recursive techniques, such as fractal based algorithms, are used in a preferred embodiment. *Id.* Fractal layouts are particularly useful for the layout of decreasing size areas, because fractals are based on recursion; the same function is called repeatedly. *See*, Col. 5, lines 25-28. [T]he basic function is one that divides an area in quarters, then divides each outer (right and down) subdivided area into quarters repeatedly. *See*, Col. 5, lines 28-31. Because the outer areas are repeatedly divided into quarters, an infinite number of areas of increasingly smaller sizes can be generated by this "quartering" fractal function. *See*, Col. 5, lines 31-34.

In contrast, Applicant's amended claim 16 recites "*calculating the path strength between the first endpoint and the second endpoint based at least in part on multiplying the first link strength and the second link strength.*" To assist the Office in appreciating the subject matter disclosed in Applicant's Specification, Applicant refers the Office to the following excerpt from Applicant's Specification.

Applicant's Specification, Page 8, lines 1-9

The strengths of the links between the two end points are multiplied together to obtain a path strength. For example, if a particular path between two end points has two links, one with a link strength of 0.25 and the other with a link strength of 0.80, the resulting path strength is 0.20 (0.25 x 0.80).

Any path that contains at least one link with a strength of zero will have a path strength of zero, indicating that there is no common relationship between the two components at opposite ends of the path. Similarly, any link having a strength of zero indicates that there is no relationship between the components at opposite ends of the link.

In addition, the Examiner tentatively agreed that the cited reference did not appear to disclose these claim elements. Applicant thanks the Examiner for her preliminary indication.

Therefore, Applicant respectfully submits that the evidence relied upon by the Office no longer supports the rejection. Accordingly, Applicant respectfully requests that the § 102 rejection be withdrawn.

Dependent claims 18 and 22 depend directly from independent claim 16 and thus are allowable as depending from an allowable base claim. Dependent claims 18 and 22 are also allowable for their own recited features that, in combination with those recited in claim 16, are not shown by the Office to be disclosed in Martino.

Thus, Applicant respectfully submits that the Office has failed to show that each and every feature is disclosed, and thus the claims are not anticipated by Martino. Applicant respectfully requests that the §102 rejections be withdrawn.

CLAIM REJECTIONS UNDER 35 U.S.C §103: A., B., AND C.

A. Claims 1-7, 9-10, 12-15, 29-30 stand rejected under 35 U.S.C. §103(a) as being unpatentable over U.S. Patent No. 6,832,245 to Isaacs et al (hereinafter “Isaacs”) in view of Martino and in further view of U.S. Publication Number 2005/0086238 to Nevin III (Nevin). Applicant respectfully traverses the rejection.

Without conceding the propriety of the rejection and in the interest of expediting prosecution, independent claim 1 is amended to further clarify features of the claimed subject matter. Amended claim 1 now recites a method comprising (emphasis added):

identifying components associated with a first end
point in an environment;

identifying components associated with a second end point in the environment;

determining whether any of the identified components are associated with both the first end point and the second end point;

determining a path strength for each path between the first end point and the second point;

identifying relationships between the first end point, the second end point, and any components associated with both the first end point and the second end point;[and

displaying the relationships by, in part, displaying a social context associated with the first end point and a second context associated with the second end point; and

displaying associated information in response to a user's identification of either the first end point or the second end point.

Applicant respectfully submits that the Office has failed to show that Isaacs, Martino or Nevin, alone or in combination, discloses, teaches or suggests such a method.

The Reference Fails to Show the Claimed Method

Isaacs is directed towards analyzing a collection of communication messages. *See*, Abstract. The collections of communications, such as electronic mail messages, may be selected by a user and then subsequently processed to determine the identity of any of the user's contacts within the communications. *Id.* The contacts may then be arranged in a relative priority arrangement whereby contacts which have been identified as engaging in prior reciprocal communications with the user are given higher priority. *Id.*

In contrast, Applicant's amended claim 1 recites "*determining whether any of the identified components are associated with both the first end point and the second end point; determining a path strength for each path between the first end point and the second point.*"

Applicant respectfully submits that Martino fails to compensate for the deficiencies of Isaacs. Rather, Martino describes information related to a reference node is displayed prominently, and information items related to the other nodes are displayed with a prominence that reflects each node's degree of separation from the user selected reference node. *See*, Abstract. To present a consistent interface regardless of the user's point of reference, recursive techniques, such as fractal based algorithms, are used in a preferred embodiment. *Id.* Fractal layouts are particularly useful for the layout of decreasing size areas, because fractals are based on recursion; the same function is called repeatedly. *See*, Col. 5, lines 25-28. [T]he basic function is one that divides an area in quarters, then divides each outer (right and down) subdivided area into quarters repeatedly. *See*, Col. 5, lines 28-31. Because the outer areas are repeatedly divided into quarters, an infinite number of areas of increasingly smaller sizes can be generated by this "quartering" fractal function. *See*, Col. 5, lines 31-34.

In addition, Nevin fails to compensate for the deficiencies of Martino and/or Isaacs, alone or in combination. Rather, Nevin describes a method for storing, manipulating, accessing and displaying data and its relationships. *See*, paragraph [0029]. Data is stored into nodes which are linked together. *See*, paragraph [0031].

Thus, Isaacs, Martino, and/or Nevin, alone or in combination, do not disclose, teach, or suggest the claimed subject matter. Accordingly, Applicant submits that the evidence relied upon by the Office does not support the rejections under § 103 and respectfully requests that the § 103 rejection of these claims should be withdrawn.

Dependent claims 1-7, 9-10, and 12-15 depend directly or indirectly from independent claim 1 and thus are allowable by virtue of this dependency, as well as for

additional features that they recite. Applicant also respectfully requests individual consideration of each dependent claim.

Applicant respectfully submits that the cited references do not render the claimed subject matter obvious and that the claimed subject matter therefore, patentably distinguishes over the cited references. For all of these reasons, Applicant respectfully requests the § 103 rejection of these claims should be withdrawn.

Dependent claims 29 and 30 depend from independent claim 23. As explained below with respect to claim 23, Applicant submits that Martino and/or Nevin fail to disclose, teach, or suggest the features of independent claim 23. Dependent claim 29 and 30 depend from independent claim 23 and are allowable by virtue of this dependency. These dependent claims are also allowable for their own recited features that, in combination with those recited in claim 23, are not disclosed, taught or suggested by Isaacs, Martino and/or Nevin, alone or in combination.

Applicant respectfully submits that Isaacs fails to compensate for the deficiencies of Martino and/or Nevin. Rather, Isaacs describes analyzing a collection of communication messages. *See*, Abstract. The collections of communications, such as electronic mail messages, may be selected by a user and then subsequently processed to determine the identity of any of the user's contacts within the communications. *Id.* The contacts may then be arranged in a relative priority arrangement whereby contacts which have been identified as engaging in prior reciprocal communications with the user are given higher priority. *Id.*

Thus, Isaacs, Martino, and/or Nevin, alone or in combination, do not disclose, teach, or suggest those features in Applicant's claims 29 and 30. Accordingly, Applicant submits

that the evidence relied upon by the Office no longer supports the rejections made under § 103. Applicant respectfully requests reconsideration and withdrawal of the stated § 103 rejection of these claims.

B. Claims 23-28 stand rejected under 35 U.S.C. § 103(a) as being obvious over U.S. Patent No. 6,486,898 to Martino in view of U.S. Patent Application No. 2005/0086238 to Nevin. Applicant respectfully traverses the rejection.

Without conceding the propriety of the stated rejection, and only to advance the prosecution of this application, Applicant amends independent claim 23 to further clarify features of the claimed subject matter. Amended claim 23 now recites a one or more computer-readable storage media having stored thereon a computer program that, when executed by one or more processors, causes the one or more processors to (emphasis added):

- display a first end point in a social network and a social context associated with the first end point;

- display a second end point in a social network and a social context associated with the second end point;

- identify a common component associated with the first end point and the second end point;

- display the common component associated with the first end point and the second end point;

- display a link between the common component and the first end point;

- display a link between the common component and the second end point;

- calculating the path strength between the first endpoint and the second endpoint based at least in part on multiplying the first link strength and the second link strength; and*

- displaying associated information in response to a user's identification of either a first end point or a second end point.

Applicant respectfully submits that the Office has failed to show that such a computer system is disclosed, taught, or suggested by Martino and/or Nevin, alone or in combination.

The Reference Fails to Show the Claimed Method

The Office has failed to show that Martino discloses a method for calculating a path strength between a first endpoint and a second endpoint. However, Martino describes information related to a reference node is displayed prominently, and information items related to the other nodes re displayed with a prominence that reflects each node's degree of separation from the user selected reference node. *See*, Abstract. To present a consistent interface regardless of the user's point of reference, recursive techniques, such as fractal based algorithms, are used in a preferred embodiment. *Id*. Fractal layouts are particularly useful for the layout of decreasing size areas, because fractals are based on recursion; the same function is called repeatedly. *See*, Col. 5, lines 25-28. [T]he basic function is one that divides an area in quarters, then divides each outer (right and down) subdivided area into quarters repeatedly. *See*, Col. 5, lines 28-31. Because the outer areas are repeatedly divided into quarters, an infinite number of areas of increasingly smaller sizes can be generated by this "quartering" fractal function. *See*, Col. 5, lines 31-34.

In contrast, Applicant's amended claim 23 recites "*calculating the path strength between the first endpoint and the second endpoint based at least in part on multiplying the first link strength and the second link strength.*"

Nevin fails to compensate for the deficiencies of Martino. Rather, Nevin describes a method for storing, manipulating, accessing and displaying data and its relationships. *See*, paragraph [0029]. Data is stored into nodes which are linked together. *See*, paragraph [0031].

Thus, Martino and/or Nevin, alone or in combination, do not disclose, teach, or suggest the claimed subject matter. Accordingly, Applicant submits that the evidence relied upon by the Office does not support the rejections under § 103 and respectfully requests that the § 103 rejection of these claims should be withdrawn.

Dependent claims 24-28 depend directly or indirectly from independent claim 23 and thus are allowable by virtue of this dependency, as well as for additional features that they recite. Applicant also respectfully requests individual consideration of each dependent claim.

Applicant respectfully submits that the cited references do not render the claimed subject matter obvious and that the claimed subject matter therefore, patentably distinguishes over the cited references. For all of these reasons, Applicant respectfully requests the § 103 rejection of these claims should be withdrawn.

C. Claims 17, and 19-21 stand rejected under 35 U.S.C. § 103(a) as being obvious over U.S. Patent No. 6,486,898 to Martino as applied to claim 16 in view of U.S. Patent Application No. 2005/0086238 to Nevin. Applicant respectfully traverses the rejection.

Dependent claims 17 and 19-21 depend from independent claim 16. As explained above with respect to claim 16, Applicant respectfully submits that Martino fails to disclose

the features of independent claim 16. Dependent claims 17 and 19-21 depend directly from independent claim 16 and are allowable by virtue of this dependency. These dependent claims are also allowable for their own recited features that, in combination with those recited in claim 16, are not disclosed, taught, or suggested by Martino.

In addition, Applicant respectfully submits that Nevin fails to compensate for the deficiencies of Martino. Rather, Nevin describes a method for storing, manipulating, accessing and displaying data and its relationships. *See*, paragraph [0029]. Data is stored into nodes which are linked together. *See*, paragraph [0031].

Thus, Martino and/or Nevin, alone or in combination do not disclose, teach, or suggest the features recited in claims 17 and 19-21. Accordingly, Applicant submits that the evidence relied upon by the Office no longer supports the rejections made under § 103. Therefore, Applicant respectfully requests reconsideration and withdrawal of the stated § 103 rejection of these claims.

CONCLUSION

Claims 1-3, 5-7, 9-10, and 12-30 are in condition for allowance. Applicant respectfully requests reconsideration and prompt allowance of the subject application. If any issue remains unresolved that would prevent allowance of this case, the Office is requested to contract the undersigned attorney to resolve the issue.

Respectfully Submitted,

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